UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI JACKSON DIVISION

JIM HOOD, ATTORNEY GENERAL OF THE STATE OF MISSISSIPPI, ex rel. THE STATE OF MISSISSIPPI,

Plaintiff,

 \mathbf{v} .

CIVIL NO.: 3:12-cv-565-WHB-LRA

JPMORGAN CHASE & CO., et al.,

Defendants.

JIM HOOD, ATTORNEY GENERAL OF THE STATE OF MISSISSIPPI, ex rel. THE STATE OF MISSISSIPPI,

Plaintiff,

v.

CIVIL NO.: 3:12-cv-571-WHB-LRA

HSBC BANK NEVADA, N.A., et al.,

Defendants.

JIM HOOD, ATTORNEY GENERAL OF THE STATE OF MISSISSIPPI, ex rel. THE STATE OF MISSISSIPPI,

Plaintiff,

v.

CIVIL NO.: 3:12-cv-572-WHB-LRA

CITIGROUP INC., et al.,

Defendants.

JIM HOOD, ATTORNEY GENERAL OF THE STATE OF MISSISSIPPI, ex rel. THE STATE OF MISSISSIPPI,

Plaintiff,

v.

CIVIL NO.: 3:12-cv-573-WHB-LRA

DISCOVER FINANCIAL SERVICES, INC., et al.,

Defendants.

JIM HOOD, ATTORNEY GENERAL OF THE STATE OF MISSISSIPPI, ex rel. THE STATE OF MISSISSIPPI,

Plaintiff,

v.

CIVIL NO.: 3:12-cv-574-WHB-LRA

BANK OF AMERICA CORPORATION, et al.,

Defendants.

JIM HOOD, ATTORNEY GENERAL OF THE STATE OF MISSISSIPPI, ex rel. THE STATE OF MISSISSIPPI,

Plaintiff,

v.

CIVIL NO.: 3:12-cv-575-WHB-LRA

CAPITAL ONE BANK (USA) N.A., et al.,

Defendants.

CHASE DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL

Defendants JPMorgan Chase & Co. and Chase Bank USA, N.A. (collectively "the Chase Defendants") submit this unopposed motion for a one-week extension of the deadline by which Defendants in the consolidated above-captioned actions must file a rebuttal in support of their motion for decision on the substantial federal question issue and to stay remand. In support of this unopposed motion, the Chase Defendants state as follows:

- 1. Pursuant to the Court's Order dated November 29, 2012 (Doc. 26), the Court appointed the Chase Defendants as Lead Defendants in the consolidated actions for purposes of the State's motion to remand.
- 2. Defendants in the consolidated actions filed a motion for decision on the substantial federal question issue and to stay remand on December 26, 2013 (Doc. 55), and the State filed its response on December 30, 2013 (Doc. 57). Under Local Rule 7(b)(4), Defendants have seven days from the date of the response to file a rebuttal, that is, until January 6, 2014.
- 3. In light of the holidays and to facilitate the coordination of a single joint brief for all defendants, the Chase Defendants seek a one-week extension—until January 13, 2014—to file Defendants' rebuttal.
 - 4. The State does not oppose the extension request.
- Counsel for the Chase Defendants is submitting a proposed order consistent with the foregoing.

WHEREFORE, the Chase Defendants respectfully request that this Court grant this unopposed motion and enter an order giving Defendants until January 13, 2014, to file their rebuttal.

DATED: January 2, 2014

JPMORGAN CHASE & CO. and CHASE BANK USA, N.A.

By: /s/ Phillip S. Sykes

Alan W. Perry (MB No. 4127) Phillip S. Sykes (MB No. 10126)

FORMAN PERRY WATKINS KRUTZ &

TARDY LLP

200 South Lamar Street, Suite $100~({\rm Zip}$

39201)

P.O. Box 22608

Jackson, MS 39225-2608

Tel: (601) 960-8600 Fax: (601) 960-8613 E-mail: aperry@fpwk.com

psykes@fpwk.com

Robert D. Wick (admitted *pro hac vice*) Andrew Soukup (admitted *pro hac vice*) COVINGTON & BURLING LLP 1201 Pennsylvania Avenue, NW Washington, DC 20007

Tel: (202) 662-6000 Fax: (202) 662-6291 E-mail: rwick@cov.com

asoukup@cov.com

CERTIFICATE OF SERVICE

I hereby certify that on January 2, 2014, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send a notification of such filing to the counsel of record who have entered appearances in this action.

/s/ Phillip S. Sykes
Phillip S. Sykes